

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

UNITED STATES OF AMERICA	)	
	)	No. 3:20-cr-00165
v.	)	JUDGE CAMPBELL
	)	
CALEB D. JORDAN	)	

**UNOPPOSED MOTION TO CONTINUE TRIAL  
AND TO EXTEND FILING DATE FOR PRETRIAL MOTIONS**

Defendant Caleb D. Jordan respectfully requests that this Honorable Court enter an order granting a continuance of the trial presently set for December 22, 2020 and extending the filing date for pretrial motions, for a period of at least six (6) months, or 180 days. Although this is a long continuance, this is the first requested continuance and the government does not object to it, as described below.

By any measure, this is a difficult case. Mr. Jordan is accused of numerous, very serious offenses, with multiple instances alleged over a lengthy period of time and numerous electronic devices that the government alleges to contain unlawful images or that were alleged to have been used in the offenses. He was initially arrested and charged on a complaint in late April 2020, when the investigation was still in its early stages. Because he was not indicted or arraigned due to the lack of a grand jury in the current pandemic, the government did not immediately produce discovery (the production of which is triggered by arraignment under the local rules), although it made the electronic devices available for inspection. The government began its production of discovery in October, and it has promised to disclose additional material. Undersigned counsel has begun a forensic inspection of this electronic material and anticipates needing considerably more time, especially given the number of devices and legal restrictions that prevent counsel's

expert from reviewing this material anywhere except the offices of the Department of Homeland Security.

Further complicating matters, Mr. Jordan is a 19-year-old young man who has been previously diagnosed on the autism spectrum. There are voluminous medical records related to his diagnosis and care, which counsel has begun the process of collecting and reviewing. Counsel likewise anticipates retaining an outside expert to evaluate Mr. Jordan for questions of competency and other concerns. Unfortunately, the current pandemic has increased the difficulty of such evaluations considerably given current restrictions on jail visits and individual concerns of various experts regarding such conditions.

In short, this is likely to be an expensive and difficult case due to the need for expert investigation into both computer forensics and mental health. Undersigned counsel reasonably believes that a lengthy initial continuance would be both necessary and appropriate to allow counsel to provide the sort of representation required by the Sixth Amendment in a case of this complexity. Accordingly, the requested continuance would serve the interests of justice.

The parties have discussed all the above concerns and the government does not object to the requested continuance. The defendant respectfully requests that the Court continue the trial date presently set for December 22, 2020, for at least six months, or approximately 180 days.

Mr. Jordan has expressly consented to a lengthy continuance in conversation with counsel, and he has signed a written waiver of his rights to a speedy trial and that waiver is filed contemporaneously with this motion.

Respectfully submitted,

s/ Andrew C. Brandon

ANDREW C. BRANDON  
Assistant Federal Public Defender  
810 Broadway, Suite 200  
Nashville, Tennessee 37203  
615-736-5047

Attorney for Caleb D. Jordan

**CERTIFICATE OF SERVICE**

I hereby certify that on December 8, 2020, I electronically filed the foregoing Unopposed Motion to Continue Trial and to Extend Filing Date for Pretrial Motions with the U.S. District Court Clerk by using the CM/ECF system, which will send a Notice of Electronic Filing to S. Carran Daughtrey, Assistant United States Attorney, U.S. Attorney's Office, 110 Ninth Avenue, South, Suite A961, Nashville, Tennessee 37203-3870 and Kyle P. Reynolds, Trial Attorney, U.S. Department of Justice, Criminal Division, 1301 New York Avenue, NW, Washington, DC 20005.

s/ Andrew C. Brandon

ANDREW C. BRANDON